
United States District Court
EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ZAKARY KEEGAN REYNOLDS,

Defendant.

SEALED

CRIMINAL COMPLAINT

Case No. 21-MJ-436-SPS


I, Special Agent Traylon M. Williams, the undersigned complainant, state that the following is true to the best of my knowledge and belief.

On or about November 12, 2021, in the Eastern District of Oklahoma, defendant, **ZAKARY KEEGAN REYNOLDS**, committed the crime of Bank Robbery, in violation of Title 18, United States Code, Section 2113.

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

See attached Affidavit of Special Agent Traylon M. Williams, which is attached hereto and made a part hereof by reference.

☒ Continued on the attached sheet.




Special Agent Traylon M. Williams
Federal Bureau of Investigation
Complainant

Sworn to before me and subscribed in my presence at: MUSKOGEE, OKLAHOMA

Date: November 18, 2021

STEVEN P. SHREDER
UNITED STATES MAGISTRATE JUDGE
Title of Judicial Officer



Signature of Judicial Officer



**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF OKLAHOMA**

AFFIDAVIT

I, Special Agent Traylon M. Williams, being duly sworn, depose and state that:

INTRODUCTION

1. I am a Special Agent of the Federal Bureau of Investigation ("FBI"). I have been so employed since February 2009. I am currently assigned to the FBI Houston Division, and I am on a temporary duty assignment in the Oklahoma City Division – Ardmore Resident Agency, conducting criminal investigations, including, but not limited to, violations associated with Indian Country crimes. Prior to being employed as a Special Agent, I was a Management and Program Analyst with the FBI assigned to the FBI Headquarters in Washington, D.C., where I helped manage the FBI's inspection programs.

2. As a Federal Agent, I am authorized to investigate violations of the laws of the United States and to execute warrants issued under the authority of the United States.

3. The statements contained in this Affidavit are based in part on information provided by other agencies that I have received, directly or indirectly, from other law enforcement agents; independent investigation; and my experience, training, and background as a Special Agent with the FBI. Because this Affidavit is being submitted for the limited purpose of establishing probable cause to believe that **ZAKARY KEEGAN REYNOLDS** committed the offense described below, I have not included every detail of the investigation. In addition, unless otherwise indicated, all statements contained in this Affidavit are summaries in substance and in part. The following is true to the best of my knowledge and belief.

PROBABLE CAUSE

4. As will be shown below, there is probable cause to believe that **ZAKARY KEEGAN REYNOLDS** committed the crime of Bank Robbery, in violation of 18 U.S.C. § 2113.

5. VENUE: The facts and circumstances alleged in this affidavit occurred within the Eastern District of Oklahoma.

6. DEFENDANT: **ZAKARY KEEGAN REYNOLDS**, hereinafter referred to as REYNOLDS.

7. VICTIM: Victim bank is American Nation Bank, located at 205 N. Commerce Street, Ardmore, Oklahoma 73401. American Nation Bank is federally insured by the Federal Deposit Insurance Corporation and a recognized bank by the Federal Reserve System and under the laws of the United States, pursuant to 18 U.S.C. § 2113(f).

8. I received information regarding a crime, which occurred in Ardmore, Oklahoma within the boundaries of the Eastern District of Oklahoma. This affidavit is intended to show there is sufficient probable cause for a Complaint and does not set forth all of my knowledge about this matter. This affidavit is made in support of a Complaint and Arrest Warrant for REYNOLDS for the crime of Bank Robbery, in violation of 18 U.S.C. § 2113.

9. On November 12, 2021, at approximately 3:14 PM, American Nation Bank's security footage showed REYNOLDS walking across the parking lot. REYNOLDS entered the American Nation Bank, at approximately 3:15 PM. REYNOLDS is observed on video footage wearing a medical mask and a red wig approaching an American Nation Bank Teller ("Teller"). REYNOLDS is also seen handing the Teller a note. The note read "this is a robbery; if you blink wrong, I will kill you; I have a gun, if you give me bait money I will kill you." The note had a sad face drawn on it. The Teller handed over \$12,650.00 to REYNOLDS. At approximately 3:16 PM,

REYNOLDS departed the American Nation Bank. REYNOLDS was observed entering a red Ford Ranger truck and departing the nearby Walmart parking lot adjacent from American Nation Bank.

10. During an interview with the Teller, she informed law enforcement that as the note was passed to her, she remained quiet and followed the directions of REYNOLDS. The Teller was scared and shaking during her encounter with REYNOLDS. The Teller advised threats were made by REYNOLDS, but no weapons were visible during the bank robbery. REYNOLDS appeared to be alone.

11. Subsequent review of security footage from the nearby Walmart showed REYNOLDS leaving the parking spot near American Nation Bank, driving through the Walmart parking lot, stopping briefly in the Walmart parking lot, and proceeding to a Casey's gas station. At Casey's, REYNOLDS parked his vehicle next to gas pump number 8 and entered the gas station at approximately 3:30 PM. REYNOLDS departed from inside of the gas station at approximately 3:33 PM. REYNOLDS departed the gas station at approximately 3:36 PM.

12. Subsequent to the bank robbery, the FBI put out an alert on social media of the bank robbery, including a photo of the suspect. The FBI received a tip from an individual who was familiar with the suspect and identified him as REYNOLDS. The FBI was able to corroborate the tipster's information through REYNOLDS and E.D.'s Facebook pages. E.D. is REYNOLDS girlfriend. In one of E.D.'s photos on Facebook, she has a picture of the same red wig used by REYNOLDS in the bank robbery. Also, the FBI later showed a photo of REYNOLDS to the Teller. The Teller identified REYNOLDS as the suspect.

13. Based on a review of this case and based on my knowledge and experience with violent and financial crimes, I, as your Affiant have probable cause to believe that **ZAKARY KEEGAN REYNOLDS** committed the crime of Bank Robbery, in violation of 18 U.S.C. § 2113.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Traylon M. Williams", written over a horizontal line.

Traylon M. Williams
Special Agent
Federal Bureau of Investigation

Sworn before me this day, November 18, 2021.

A handwritten signature in blue ink, appearing to read "Steven D. [unclear]", written over a horizontal line.

United States Magistrate Judge
Eastern District of Oklahoma